

January 12, 2022

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 5127 – 2021 Annual Retail Rate Filing
Responses to PUC Data Requests – Set 7**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“Company”), I have enclosed the electronic version of the Company’s responses to the Public Utilities Commission’s (“Commission”) Seventh Set of Data Requests in the above-mentioned proceeding.¹

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2126.

Very truly yours,



Laura C. Bickel
RI Bar # 10055

Enclosures

cc: Docket 5127 Service List
Jon Hagopian, Esq., Division of Public Utilities and Carriers
John Bell, Division of Public Utilities and Carriers
Albert Vitali, Esq., Office of Energy Resources
John Harrington, Esq., Public Utilities Commission

¹ Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

January 12, 2022

Date

**National Grid – 2021 Annual Retail Rate Filing - Docket No. 5127
Service List Updated 4/1//2021**

Name/Address	E-mail Distribution	Phone
National Grid Andrew S. Marcaccio, Esq. National Grid. 280 Melrose St. Providence, RI 02907	andrew.marcaccio@nationalgrid.com ;	401-784-4263
	Celia.obrien@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
	theresa.burns@nationalgrid.com ;	
	Scott.mccabe@nationalgrid.com ;	
	Adam.crary@nationalgrid.com ;	
	Tiffany.Forsyth@nationalgrid.com ;	
	Michael.artuso@nationalgrid.com ;	
	Alexei.Spinu@nationalgrid.com ;	
	Melissa.little@nationalgrid.com ;	
	Brooke.skulley@nationalgrid.com ;	
	Timothy.roughan@nationalgrid.com ;	
Jeffrey.oliveira@nationalgrid.com ;		
Division of Public Utilities Tiffany Parenteau, Esq. Gregory S. Schultz, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903 Christy Hetherington, Esq. Division of Public Utilities	Tparenteau@riag.ri.gov ;	401-222-2424
	gshultz@riag.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Joel.munoz@dpuc.ri.gov ;	
	Christy.hetherington@dpuc.ri.gov ;	
	Margaret.L.Hogan@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov	
	dmacrae@riag.ri.gov ;	
Kathleen A. Kelly Carrie Gilbert Aliea Afnan Daymark Energy Advisors	kkelly@daymarkea.com ;	
	cgilbert@daymarkea.com ;	
	aafnan@daymarkea.com ;	
Public Utilities Commission	Luly.massaro@puc.ri.gov ;	401-780-2017

Luly E. Massaro, Commission Clerk John Harrington, Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	John.harrington@puc.ri.gov ;	
	Rudolph.S.Falcone@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Emma.Rodvien@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Office of Energy Resources Albert Vitali, Esq. Nicholas Ucci Christopher Kearns	Albert.Vitali@doa.ri.gov ;	401-222-8880
	nancy.russolino@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Shauna.Beland@energy.ri.gov ;	
	Nicholas.ucci@energy.ri.gov ;	
	Becca.Trietch@energy.ri.gov ;	
	Carrie.Gill@energy.ri.gov ;	
PPL Electric Utilities Ronald Reybitz Stephen Breininger	rjreybitz@pplweb.com ;	
	skbreininger@pplweb.com ;	
Green Development Matt Sullivan	ms@green-ri.com ;	

PUC 7-1

Request:

Please recreate the table that appears at the top of page 3 of National Grid's response to PUC 5-1, but break out each row in the current table (i.e, Total Excess Credits, Total Excess Generation, Total Charge, and Number of Net Metering Systems) into the following four rows:

- a. Standalone/separately metered and >25 kW
- b. Behind-the-meter and >25 kW
- c. Standalone/separately metered and ≤ 25 kW
- d. Behind-the-meter and ≤ 25 kW

Response:

Below, please find tables comparing the Volumetric and Monetary Methods for CY 2019 and CY 2020 from the Company's response to PUC 5-1, with the additional details requested for this response, plus the detail requested for the response to PUC 7-3. For ease of comparison, the above-mentioned project categories are shown as columns in these tables. Please note that, per part (c) of this request, above, there are no standalone systems less than 25kW, and this column has been omitted.

PUC 7-3 directed the Company to "assume all excess generation for behind-the-meter facilities is less than 125%" and to "calculate the minimum value of excess generation for behind-the-meter-facilities." Accordingly, the Company valued all excess generation of BTM customers at the Standard Offer Service (or "avoided cost") rate, to determine the corresponding "minimum charge" in the tables below. As shown below, there is a difference between the Total Charge¹ and the Minimum Charge² for BTM systems, but these amounts are much lower than the Total Charge for standalone systems, and do not vary much based on whether the Volumetric Method or the Monetary Method is used.

¹ The Total Charge is based on the "Excess Renewable Net Metering Credit" for any amount of kWh in excess of 100% of the customer's consumption up to 125% of the customer's consumption, plus the Renewable Net Metering Credit for all kWh generated in excess of 125% of the customer's consumption, based on Section II(5) of R.I.P.U.C. No. 2241, the Net Metering Tariff.

² The Minimum Charge is based on the difference between the "Renewable Net Metering Credit" and the "Excess Renewable Net Metering Credit," a credit equal to the Company's "avoided cost rate," based on Section II(5) of R.I.P.U.C. No. 2241, the Net Metering Tariff.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5127
In Re: 2021 Annual Retail Rate Filing
Responses to the Commission's Seventh Set of Data Requests
Issued December 29, 2021

PUC 7-1, page 2

Table 1 – CY 2019 Volumetric Method

2019 Volumetric	Greater than 25 kW		Less than 25 kW	Total
	BTM	Standalone	BTM	
Number of Net Metering Systems	13	5	620	638
Total Excess Credits (\$)	\$19,711	\$609,536	\$85,684	\$714,931
Total Excess Generation (kWh)	249,153	2,639,962	818,461	3,707,576
Total Charge (\$)	\$18,319	\$202,289	\$87,724	\$308,333
Minimum Charge for BTM Projects (\$)	\$11,962	N/A	\$65,175	\$77,137

Table 2 – CY 2019 Monetary Method

2019 Monetary	Greater than 25 kW		Less than 25 kW	Total
	BTM	Standalone	BTM	
Number of Net Metering Systems	10	24	506	540
Total Excess Credits (\$)	\$22,214	\$2,651,199	\$98,277	\$2,771,690
Total Excess Generation (kWh)	124,593	14,954,867	523,173	15,602,634
Total Charge (\$)	\$13,561	\$1,452,124	\$52,575	\$1,518,260
Minimum Charge for BTM Projects (\$)	\$9,448	N/A	\$41,626	\$51,074

Table 3 – CY 2020 Volumetric Method

2020 Volumetric	Greater than 25 kW		Less than 25 kW	Total
	BTM	Standalone	BTM	
Number of Net Metering Systems	26	12	831	869
Total Excess Credits (\$)	\$31,470	\$839,385	\$91,429	\$962,284
Total Excess Generation (kWh)	588,561	10,185,472	1,122,218	11,896,251
Total Charge (\$)	\$51,732	\$918,506	\$125,545	\$1,095,782
Minimum Charge for BTM Projects (\$)	\$31,470	N/A	\$91,429	\$122,899

Table 4 – CY 2020 Monetary Method

2020 Monetary	Greater than 25 kW		Less than 25 kW	Total
	BTM	Standalone	BTM	
Number of Net Metering Systems	17	40	661	718
Total Excess Credits (\$)	\$56,008	\$8,267,819	\$140,835	\$8,464,662
Total Excess Generation (kWh)	349,122	49,481,234	779,721	50,610,077
Total Charge (\$)	\$38,890	\$6,059,917	\$86,732	\$6,185,539
Minimum Charge for BTM Projects (\$)	\$26,108	N/A	\$67,331	\$93,439

PUC 7-1, page 3

Please note that, on the table on page 3 of the response to PUC 5-1, the Company had used the same Total Excess Credit values from the Monetary Method analysis in the Volumetric Method analysis because: (1) excess credit data was not collected as part of the Volumetric Method; and (2) all projects included in the Monetary Method analysis were assumed also to be in the Company's Volumetric Method analysis.

Upon further review, however, the Company has discovered that some projects included in the Monetary Method analysis were excluded from the Volumetric Method analysis. As a result, in the tables above, the Company summed the excess credit in the Volumetric Method for only those projects that were included in the Monetary Method analyses, which led to lower values than the values reported in the table on page three of the response to PUC 5-1.

PUC 7-2

Request:

On page 2 of National Grid's response to PUC 5-1, National Grid states, "For [behind-the-meter] net metering systems, the Company cannot identify the customer's actual generation or the customer's actual usage. Therefore, in order to perform the analysis, the Company used the customer's estimated generation from the customer's initial Schedule B." Please confirm the following is true:

- a. National Grid can identify which behind-the-meter have excess generation in a year and by how much (Step 1 on page 2 of Attachment PUC 5-1-1) by summing monthly net meter reads or by comparing January-to-January excess credits.
- b. For behind-the-meter facilities, National Grid cannot identify the fraction of annual consumption the excess generation identified in Step 1 represents (e.g., 101%, 111%, 121%, 131%, etc.) without making an assumption about how the net meter reads relate to actual annual generation and actual annual consumption.
- c. All of the excess credits identified in Step 1 should be reduced by *at least* the value of the appropriate transmission, transition, and distribution charges because all of these excess credits *certainly* fall above 100% of annual consumption.
- d. Some of the excess credits identified by Step 1 *might also* fall above 125% of annual consumption, and so should also be reduced by the appropriate supply charge, but it is impossible to know what portion of the excess credits fall in this category *with certainty*.
- e. Thus, the *minimum possible* total excess generation charge for behind-the-meter systems (using either the Volumetric or Monetary methods) is calculated by assuming all excess credits for these facilities are less than 125% of annual consumption.

Response:

All above mentioned statements (a through e) are true.

PUC 7-3

Request:

Please recreate the response to 7-1 above, but in this response, calculate the minimum value of excess generation for behind-the-meter-facilities—in other words, assume all excess generation for behind-the-meter facilities is less than 125% in Step 2 on page 2 of Attachment PUC 5-1-1.

Response:

Please refer to the Company's response to PUC 7-1.